

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

United States of America

v.

Kourtney Haley

Defendant(s)

Case No.

24-mj-613-SA

FILED
 OCT 03 2024
 Heidi D. Campbell, Clerk
 U.S. DISTRICT COURT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 1, 2024 in the county of Tulsa in the
 Northern District of Oklahoma, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)(1) and 841(b)(1)
 (B)(viii)

Possession of Methamphetamine with Intent to Distribute

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.*Patrick Pryce**Complainant's signature*

Patrick S. Pryce, TFO DEA Special Agent

Printed name and title

Sworn to before me by phone.

Date:

10/3/24*Susan E. Huntsman**Judge's signature*

City and state:

Tulsa, OK

Susan E. Huntsman, United States Magistrate Judge

Printed name and title

**Affidavit In Support of an Arrest Warrant
in the Northern District of Oklahoma**

I, Patrick S. Pryce, being first duly sworn, hereby depose and state:

Introduction

1. I am a police officer with the Tulsa Police Department (TPD) and have been so employed for over nineteen (19) years. I am presently assigned to the Drug Enforcement Administration (DEA) as a Task Force Officer (TFO). I am an “investigative or law enforcement officer” of the United States within the meaning of Title 21, United States Code, Section 878(a).

2. During my time as a Narcotics and Gangs Detective with TPD Special Investigations Division (SID), and as a TFO with DEA, I have participated in wire and physical surveillance, surveillance of undercover transactions, the introduction of undercover agents, the execution of search warrants, debriefings of informants and reviews of taped conversations and drug records. Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored, and distributed and the methods of payment for such drugs. I have participated in numerous complex conspiracy cases prosecuted within the federal justice system. I have trained other Narcotics, Gang and Crime Gun Unit Detectives with the Tulsa Police Department Special Investigations Division and I have taught a CLEET certified class to the Tulsa Police Department on the National Integrated Ballistic Information Network (NIBIN). I have completed formal training

in narcotics investigations from the Tulsa Police Academy and the DEA, and have received informal training received from more experienced investigators.

3. I have participated in hundreds of drug-related criminal investigations. I have authored both federal and state search warrants, participated in Title III investigations and participated in controlled purchases of controlled dangerous substances. I have gained a considerable amount of knowledge about drug trafficking organizations and their members through my training and experience. I have interviewed hundreds of defendants involved in the use, manufacture, transportation, and illegal sale of controlled dangerous substances. During the course of these interviews, I have inquired and learned how individuals involved in drug distribution schemes and networks use and disperse the illegal proceeds generated from the illegal sale of controlled dangerous substances, including but not limited to chemicals commonly utilized in the illegal manufacture of methamphetamine. During the course of my training and interviews with various defendants, I have learned how individuals involved in drug distribution schemes maintain records and conspire to deceive law enforcement as well as rival distributors of controlled dangerous substances. I also know that drug traffickers and others involved in criminal activity often use coded language to communicate about their illegal activities. Based on my training and experience, I know coded language is used by drug dealers to attempt to hide the true nature of the conversations.

4. The information contained in this Affidavit in support of an arrest warrant for **Kourtney Haley**, based on the ongoing joint investigation of the DEA

and TPD. The facts in this affidavit come from my personal observations, my training and experience, reports and information from agents and other law enforcement officers, and information obtained throughout the course of this investigation. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 21 U.S.C. § 841(a)(1) and 841(b)(1)(B)(viii) – Possession of Methamphetamine with Intent to Distribute – have been committed by the above-named individual.

Probable Cause

5. The DEA and the TPD SID are currently conducting a joint investigation targeting a Mexico-based drug trafficking organization (DTO) distributing methamphetamine in the Northern District of Oklahoma.

6. During the course of this investigation, Investigators identified the residence at 801 North Gary Place, Tulsa, Oklahoma as a residence where drugs were suspected of being kept and/or sold from. Investigators identified a female named **Kourtney Haley** as the person believed to be residing at and selling methamphetamine from this residence. Investigators also discovered that Haley is a member of the Muscogee Creek Nation.

7. On October 1, 2024, at approximately 1250 hours, members of the DEA Tulsa Resident Office (TRO) and the TPD executed a federal search warrant at 801 North Gary Place. During the execution of the search warrant, investigators

recovered approximately 400 grams of suspected methamphetamine from the southwest bedroom. Investigators conducted a field test of the suspected methamphetamine and received a presumptive positive result for methamphetamine. Investigators also located a blue Motorola brand cellular telephone from the southwest bedroom. **Kourtney Haley** was present at the residence at the time of service and was arrested as a result.

8. **Kourtney Haley** was advised of her Miranda Rights, stated that she understood those rights, signed a rights waiver and agreed to speak with investigators. Post Miranda, she stated (in part) the following:

- That she lives at 801 North Gary Place, Tulsa, Oklahoma and has lived at this residence for several months;
- That her bedroom was the southwest bedroom and that she had methamphetamine inside her bedroom; and
- That she sells methamphetamine.

9. **Kourtney Haley** consented to a search of her cellular telephone. Investigators examined her cellular telephone and observed numerous text message conversations indicative of distribution of controlled dangerous substances.

10. Based on the foregoing, I submit that probable cause exists to believe **Kourtney Dawn Haley** committed violations of 21 U.S.C. § 841(a)(1) and 841(b)(1)(B)(viii) – Possession of Methamphetamine with Intent to Distribute, and respectfully request an arrest warrant be issued.

Patrick Pryce

Patrick S. Pryce, TFO
Drug Enforcement Administration

Sworn and subscribed to before me this 3rd day of October, 2024.

Susan E. Huntsman

Susan E. Huntsman
United States Magistrate Judge